

March 4, 2022

VIA ECF

The Honorable Hildy Bowbeer
United States Magistrate Judge
734 Federal Building
316 N. Robert Street
St. Paul, MN 55101

Re: *In re Cattle and Beef Antitrust Litigation*, No. 20-cv-1319 (JRT/HB)

Dear Magistrate Judge Bowbeer,

We write on behalf of all parties. As Your Honor is aware, the parties submitted competing proposals on the case management schedule that should be applied in this litigation. *See* Dkt. 283, 284. Since the parties' submission of proposals, the parties have been diligently meeting and conferring on discovery issues, have reached agreement on numerous issues, and recently presented some issues to the Court for resolution. Given the overall status of the discovery disputes and negotiations, including the need for the parties to further meet and confer on search methodology processes, it has become apparent that a number of the schedule deadlines proposed by the parties are no longer realistic and will need further adjustment.

As such, the parties respectfully propose that the Court defer entering a case management schedule at this time to allow the parties to meet and confer on updated proposed deadlines in advance of the scheduled April 1, 2022 Case Management Conference. Toward this end, to the extent the Court is able to provide the parties guidance at the upcoming motion hearings—particularly regarding disputed issues such as the overlap of class certification with fact discovery, whether there should be production of documents from priority custodians, and limits on depositions, interrogatories and request for admission—that would aid the parties' discussions. Regardless, the parties would plan to provide the Court with updated proposals by March 30, and possibly an agreed proposal, in advance of the April 1 Case Management Conference.

Respectfully submitted,

/s/ Jessica J. Nelson

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